

# **EXHIBIT 9**

CAUSE NO. 2023-38238

ZURICH AMERICAN INSURANCE	§	IN THE DISTRICT COURT OF
COMPANY, HCC INTERNATIONAL	§	
INSURANCE COMPANY PLC,	§	
PHILADELPHIA INDEMNITY	§	
INSURANCE COMPANY AND EVEREST	§	
REINSURANCE COMPANY,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
vs.	§	HARRIS COUNTY, TEXAS
	§	
APACHE CORPORATION and DEUTSCHE	§	
BANK AG NEW YORK BRANCH,	§	
	§	
<i>Defendants.</i>	§	281ST JUDICIAL DISTRICT

**SWORN MOTION OF NON-RESIDENT ATTORNEY  
SCOTT C. WILLIAMS TO APPEAR *PRO HAC VICE***

TO THE HONORABLE JUDGE OF SAID COURT:

I, Scott C. Williams, under the authority of the Rules of Admission of the Bar of Texas, Rule XIX, file this Sworn Motion to Appear Pro Hac Vice in the above-referenced case on behalf of Plaintiff Philadelphia Indemnity Insurance Company. In support of this Motion, I would respectfully show unto the Court as follows:

**I. FACTS**

1. As a mandatory initial requirement, I have complied with the requirements of Texas Government Code § 82.0361 by paying a non-resident attorney fee to the Board of Law Examiners. A true and correct copy of the Non-Resident Acknowledgement Letter is attached hereto as Exhibit A.

2. My office address is 1201 Demonbreun Street, Suite 900, Nashville, TN 37203. My telephone number is (615) 244-0030. My fax number is (615) 242-4203. My e-mail address is swilliams@manierherod.com.

3. I will be associated in these proceedings with Philip Eisenberg of Locke Lord LLP, who will personally participate in this action. Mr. Eisenberg is a practicing attorney and a member of the State Bar of Texas. Mr. Eisenberg's State Bar card number is 24033923. His office address is 600 Travis Street, Suite 2800. His telephone number is (713) 226-1200. His fax number is (713) 223-3717. His e-mail address is [peisenberg@lockelord.com](mailto:peisenberg@lockelord.com).

4. On May 13, 2022, I moved for leave to appear *pro hac vice* in the United States Bankruptcy Court for the Southern District of Texas in the case styled *In re: Talen Energy Supply, LLC*, No. 4:22-BK-90054. My motion to appear *pro hac vice* was granted on May 16, 2022. On June 3, 2022, I moved to appear *pro hac vice* in the United States Bankruptcy Court for the Southern District of Texas in the case styled *In re: Burnside Services, Inc.*, No. 4:22-BK-31458. My motion to appear *pro hac vice* was granted on June 6, 2022. On May 16, 2023, I moved for leave to appear *pro hac vice* in the United States Bankruptcy Court for the Southern District of Texas in the case styled *In re: MLCJR LLC, et al.*, No. 4:23-BK-90324. My motion to appear *pro hac vice* was granted on May 16, 2023. I have not appeared or sought leave to appear or participate in any other cases or causes in Texas state or federal courts in the last two years.

5. I am a practicing attorney and an active member in good standing with the Bars of the States of Tennessee (Bar No. 021757), Missouri (Bar No. 65682), and Virginia (Bar No. 96082). I am also admitted to practice, and an active member in good standing, in the following federal courts: United States District Courts for the Eastern, Western, and Middle Districts of Tennessee, the United States District Courts for the Eastern and Western Districts of Missouri, and the United States District Courts for the Eastern and Western Districts of Virginia, and am authorized to practice therein.

6. I have not been the subject of disciplinary action in the last five years by the Bar or courts of any jurisdiction in which I have been licensed.

7. I have not been denied admission to the courts of any state or to any federal court during the last five years.

8. I am familiar with the State Bar Act, the State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing conduct of members of the State Bar of Texas. I will at all times abide by and comply with those rules as long as this cause of action is pending and I have not withdrawn as counsel herein.

## II. PRAYER

For these reasons, I ask this Court to grant my Sworn Motion to Appear *Pro Hac Vice* and allow me to appear before this Court until the conclusion of this case.

Dated: June 22, 2023

Respectfully submitted,

/s/ Scott C. Williams

Scott C. Williams (*Pro Hac Vice* applicant)

MANIER & HEROD, P.C.

1201 Demonbreun Street, Suite 900

Nashville, TN 37203

T: (615) 244-0030

F: (615) 242-4203

swilliams@manierherod.com

**VERIFICATION**

My name is Scott C. Williams, my date of birth is December 6, 1972, and my business address is 1201 Demonbreun Street, Suite 900, Nashville, TN 37203. I declare under penalty of perjury that the statements contained in Paragraphs 1 through 8 of this Sworn Motion of Non-Resident Attorney Scott C. Williams to Appear *Pro Hac Vice* are true and correct and within my personal knowledge.

Executed in Davidson County, State of Tennessee, on the 22<sup>nd</sup> day of June, 2023.

/s/ Scott C. Williams  
Scott C. Williams

**Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Rose Ellis on behalf of Phil Eisenberg

Bar No. 24033923

REllis@lockelord.com

Envelope ID: 76866819

Filing Code Description: Motion (No Fee)

Filing Description: Sworn Motion of Non-Resident Attorney Scott C.

Williams to Appear Pro Hac Vice

Status as of 6/22/2023 1:50 PM CST

## Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Becky Delancy		bdelancy@clarkhill.com	6/22/2023 1:01:20 PM	SENT
Adam Diamond		ADiamond@clarkhill.com	6/22/2023 1:01:20 PM	SENT
Christopher RichardWard		cward@clarkhill.com	6/22/2023 1:01:20 PM	SENT
Jase ABrown		jbrown@csglaw.com	6/22/2023 1:01:20 PM	SENT

## **EXHIBIT A**

**Board of Law Examiners**

Appointed by the Supreme Court of Texas

June 22, 2023

Scott C. Williams

Via: E-Mail

**Acknowledgment Letter**

**Non-Resident Attorney Fee**

According to Texas Government Code §82.0361, "a nonresident attorney requesting permission to participate in proceedings in a court in this state shall pay a fee of \$250 for each case in which the attorney is requesting to participate."

**This Acknowledgement Letter serves as proof that the Board of Law Examiners has received \$250 in connection with the following matter:**

**Non-resident attorney: Scott C. Williams**

**Case: 2023-38238**

**Texas court or body: Harris County, Texas District Court**

After satisfying the fee requirement, a non-resident attorney shall file a motion in the Texas court or body in which the non-resident attorney is requesting permission to appear. The motion shall contain the information and statements required by Rule 19(a) of the Rules Governing Admission to the Bar of Texas. The motion must be accompanied by this Acknowledgment Letter and by a motion from a resident practicing Texas attorney that contains the statements required by Rule 19(b).

The decision to grant or deny a non-resident attorney's motion for permission to participate in the proceedings in a particular cause is made by the Texas court or body in which it is filed.

For more information, please see Rule 19 of the Rules Governing Admission to the Bar of Texas and §82.0361, of the Texas Government Code, which can be found on the Board's website.

Cordially,



**Nahdiah Hoang**  
**Executive Director**

**MAILING ADDRESS**

Post Office Box 13486

Austin, Texas 78711-3486

**TELEPHONE: 512- 463-1621 - FACSIMILE: 512- 463-5300**

**WEBSITE: [www.ble.texas.gov](http://www.ble.texas.gov)**

**STREET ADDRESS**

205 West 14th Street, Ste.500

Austin, Texas 78701